

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**DARK CIRCUIT LABS, INC.,**  
**Plaintiff,**

**v.**

**Case No.: 1:23-cv-00326**

**BLACK SAILS SECURITY LLC,  
JOHN CARPENTER, ERIC  
MISSIMER, MICHAEL FRANK,  
and KEITH HADDOCK**

**Defendants.**

**MOTION TO DISMISS**

Defendants Black Sails Security LLC (“Black Sails”) and John Carpenter (“Carpenter”) (together “Defendants”), pursuant to Federal Rules of Civil Procedure 12(b)(1), (b)(6), and (f), moves this Court to dismiss the Complaint in its entirety. The grounds for this Motion are set forth in the accompanying memorandum.

Done: April 14, 2023

Respectfully submitted,

BLACK SAILS SECURITY, LLC and  
JOHN CARPENTER

/s/Anne G. Bibeau

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**CERTIFICATE OF SERVICE**

I hereby certify that, on the 14<sup>th</sup> day of April 2023, I caused a true and accurate copy of the foregoing Motion to Dismiss to be served on counsel of record via the CM/ECF system and via first-class mail to:

Michael Frank  
904 Elden Street  
Herndon, VA 20170

/s/Anne G. Bibeau